

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v.

Case No. 20-mj-44

GERARDO JUNIOR TORRES,

Defendant.

COMPLAINT FOR VIOLATION OF TITLE 18, UNITED STATES CODE,
SECTION 2251(a)

BEFORE United States Magistrate Judge
Stephen L. Crocker

United States District Court
120 North Henry Street
Madison, Wisconsin 53703

The undersigned complainant being duly sworn states:

On or about January 21, 2020, in the Western District of Wisconsin, the
defendant,

GERARDO JUNIOR TORRES,

knowingly and intentionally used a minor, Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, an Apple iPhone 6 and a Seagate 1TB hard drive, to produce a visual depiction, a video with a file name that ends in 3-75, of Minor A engaged in sexually explicit conduct.

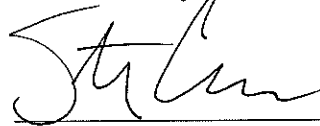
(In violation of Title 18, United States Code, Section 2251(a).)

This complaint is based on the attached affidavit of Aemus Balsis.

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AEMUS BALSIS, Detective
Taylor County Sheriff's Department

Sworn to before me telephonically this 10TH day of April 2020



HONORABLE STEPHEN L. CROCKER
MAGISTRATE JUDGE

COUNTY OF DANE)
) ss
STATE OF WISCONSIN)

AFFIDAVIT

I, Aemus M. Balsis, being first duly sworn, state as follows:

1. I am a currently employed as a detective with the Taylor County Sheriff's Office. I have been employed by Taylor County Sheriff's office since 2003 and have been a detective since 2008. I have been an Internet Crimes Against Children (ICAC) affiliate with the Wisconsin Department of Justice since 2017. I have attended training on many crimes against children topics and have been involved in numerous investigations involving computer affiliated crimes against children. I have arrested people for possession of child pornography, distribution of child pornography, child enticement, and exposure of a child to harmful materials. I have interviewed and interrogated individuals in the sexual abuse and exploitation of children and have participated in the preparation and execution of search warrants and consent searches involving those same offenses.

2. The majority of the facts in the affidavit come from my training and experience and information provided to me by citizen witnesses. This affidavit does not contain every fact I know about this investigation but merely is intended to show probable cause that Gerardo Junior Torres violated Title 18, United States Code, Section 2251(a).

3. On April 4, 2020, Taylor County Sheriff's Deputy Eric Petersen was dispatched to a reported sexual assault in Taylor County. Petersen spoke to a citizen

witness who reported a family member had been sexually assaulted by Gerardo Torres. Numerous electronic items belonging to Torres were turned over to law enforcement at that time, including an Apple iPhone 6.

4. The next day, that same citizen contacted the Taylor County Sheriff's Office, reporting she located an external computer hard drive in her home. She plugged it into her computer and found a file with Minor A's name. She reported the file contained numerous pictures and videos of Torres sexually assaulting Minor A. She reported that she sent a single image and two videos to Minor A's mother who identified Minor A in all of them. She turned over a 1 TB Seagate portable external hard drive to law enforcement.

5. On April 6, I spoke to Minor A's mother. She told me that the minor depicted in the image and videos sent to her by the reporting witness was her seven-year-old son. She reported recognizing the background in one of the images as that of her home in Rusk County.

5. On April 7, I obtained and executed a search warrant for Torres's electronic devices, including the Seagate hard drive. On it, I found numerous images and videos of Torres sexually assaulting Minor A. One video is one minute and 49 seconds long. The file name ends in 3-75 and the date 01-21-2020 is also included in the file name. The video shows Minor A's feet touching Torres's naked penis. Torres has a hand on each foot and is moving the feet back and forth on his penis. Torres ejaculates onto Minor A's feet, legs, and pants.

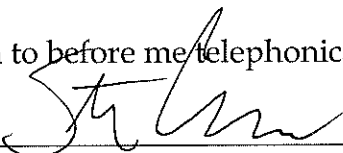
6. On April 7, 2020, I interviewed Torres. He admitted using Minor A's feet

to masturbate himself sometime in January 2020. He said his iPhone captured the video, but said the phone's camera often turns on without his knowledge.

7. There is an imprint on Torres's Apple iPhone 6 indicating it was manufactured in China. On the Seagate external hard drive where I located the video, there is an imprint indicating that the hard drive was manufactured in China.

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AEMUS BALSIS, Detective
Taylor County Sheriff's Office

Sworn to before me telephonically this 10th day of April 2020.



HONORABLE STEPHEN L. CROCKER
United States Magistrate Judge